1 2 3	Richard C. J. Wahng, Esq. SBN 225672 Christopher P. Sun, Esq., SBN 250109 Law Offices of Richard C. J. Wahng 152 Anza Street, Suite 201 Fremont, CA 94539 (510) 490-4447 Telephone (510) 344-5755 Fax	
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5	Attorney for Plaintiff	
6	JESUS MARTIN	
7	UNITED STATES DISTRICT COURT	
8	NORTHERN DISTRICT OF CALIFORNIA	
9	OAKLAND DIVISION	
10		
11	JESUS MARTIN, an individual,	Civil Action No. CV14-0409 KAW
12	Plaintiff,	MOTION TO CONTINUE CACE
13	VS.	MOTION TO CONTINUE CASE MANAGEMENT CONFERENCE;
14	HURRICANE HAULING & DEMOLITION,	STIPULATION TO CONTINUE CASE MANAGEMENT CONFERENCE;
15	INC., a California corporation; PAUL SONNABEND, an individual; DAVID	[PROPOSED] ORDER
16	SHERMAN, an individual; and DOES 1	
17	through 20 inclusive,	
18	Defendants.	
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20		
21	Plaintiff JESUS MARTIN hereby petitions the Court to continue the Initial Case	
22	Management Conference (currently scheduled for March 31, 2015 at 1:30 PM) for sixty (60)	
23	days, in light of the settlement efforts from the parties.	
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26		
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28		
	MOTION TO CONTINUE CMC; STIPULATION TO CONTINUE CMC; [PROPOSED] ORDER	

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On or about March 19, 2015, Plaintiff received certain discovery responses from Defendant Paul Sonnabend. Due to Defendant Sonnabend's discovery responses, Plaintiff will be submitting a written offer for settlement by March 27, 2015. Negotiations are ongoing and may result in a settlement soon. Dated: March 20, 2015 Law Offices of Richard Wahng /s/ CHRISTOPHER P. SUN Christopher P. Sun, Esq. Attorney for Plaintiff

1 **STIPULATION** 2 Plaintiff's counsel, Christopher P. Sun, and Defendants Hurricane Hauling and 3 Demolition, Inc., and Paul Sonnabend hereby stipulate to continue the Initial Case Management 4 Conference for sixty (60) days in light of the settlement efforts that the parties have made. While 5 Defendant Hurricane Hauling and Demolition, Inc. is still unrepresented, Paul Sonnabend has stipulated to the continuance as the owners of Defendant Hurricane Hauling and Demolition, Inc. 6 7 8 Dated: March 20, 2015 Law Offices of Richard Wahng 9 /s/ CHRISTOPHER P. SUN 10 Christopher P. Sun, Esq. Attorney for Plaintiff 11 Dated: March 20, 2015 12 13 /s/ PAUL SONNABEND 14 Paul Sonnabend Defendant 15 16 17 18 19 20 21 22 **Attestation re: Electronic Signatures** 23 In compliance with Local Rule 5-1, I, Christopher P. Sun, the effler of this document 24 hereby attest that each person whose signature block appears above has concurred in this filing. 25 26 Dated: March 20, 2015 By: /s/ CHRISTOPHER P. SUN Christopher P. Sun 27 28 MOTION TO CONTINUE CMC; STIPULATION TO CONTINUE CMC; [PROPOSED] ORDER

[PROPOSED] ORDER The request by Plaintiff's counsel, Christopher P. Sun, to continue the Initial Case Management Conference of March 31, 2015 for the aforementioned case is hereby granted. The Case Management Conference shall be set for June 23, 2015 Plaintiff's counsel shall give notice to Defendants of this order. IT IS SO ORDERED. Dated: 3/24/15